

STATE OF NEVADA



Temporary Assistance for Needy Families (TANF) Work Verification Plan FFY 2009-2015

Division of Welfare and Supportive Services
1470 College Parkway
Carson City, Nevada 89706-7924

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Working for the Welfare of ALL Nevadans

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OVERVIEW

The Nevada Division of Welfare and Supportive Services' TANF Employment and Training program is called "New Employees of Nevada (NEON)". The program provides a wide array of services designed to assist TANF households become self-sufficient primarily through training, employment, and wage gain; thereby, reducing or eliminating their dependency on public assistance programs.

I. COUNTABLE WORK ACTIVITIES

This section will describe the services the Division includes under each activity, how the number of countable hours of participation for each activity is determined, how the actual hours of participation is verified and the methods of supervision used for each unpaid work activity.

GENERAL DOCUMENTATION POLICY: Documentation to determine eligibility or verify participation hours may be mailed, emailed, faxed and/or dropped off at the appropriate district office. Documentation may be solicited and submitted directly from a third party, such as a contractor, or the participant may be responsible for obtaining and submitting acceptable documentation. All documentation received will be retained by the state for at least 37 months (the state's standard retention policy). The Division retains documentation of work activity hours in four primary locations: The individual's case jacket/file, the OASIS case management system, the NOMADs eligibility system, and Central Office (when obtained as part of the Division's TANF data reporting monthly audit). When the Division implements a document imaging system, documents will be stored as an electronic image. Verified hours are entered into our case management system for tracking and reporting purposes. Our case management system tracks all time-limited activities and flags hours in excess of those weekly/monthly limits as non-countable. Hours flagged as non-countable due to exceeding time limits are not reported. These electronic records are currently kept indefinitely.

1. Unsubsidized Employment

a. Description of Services

Unsubsidized employment is defined as full or part-time employment in a private, public or non-profit organization when the individual is receiving non-subsidized compensation for such work. Unsubsidized employment includes self-employment and work in exchange for in-kind services, but excludes employment defined under the 'subsidized employment' section below.

b. Determining Countable Hours

Projecting Hours

The Division will obtain verification of actual hours worked and report actual hours when verified. The Division will use an average of actual hours to project participation for up to six months in the future, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or

becomes known, the Division will request verification and update the projection when received.

Unless otherwise specified, actual hours of participation will be averaged as follows:

Weekly or Bi-Weekly Pay Periods:

- One full week of verified actual hours may be projected forward if the employer has signed a statement indicating the number of hours are expected to remain the same. The weekly average is entered into our tracking system for each week of the report month.
- Two or more weeks of actual hours may be averaged by totaling the number of hours worked and dividing by the number of weeks. If a week is not representative of what is expected in the future, it will be dropped or adjusted when determining the average.

For example: If the individual worked an additional 8 hours in one pay period and this will not be representative of hours they are expected to work in future months, the 8 hours will be excluded when determining a best estimate for projected hours. This is consistent with our eligibility policy for projecting income.

The weekly average is entered into our tracking system for each week of the report month.

Semi Monthly Pay Periods

- Our tracking system is designed to capture hours based on weeks, with each week being a consecutive seven-day period. To accurately report and project hours, the Division converts semi-monthly pay periods to a weekly average of hours as follows.

One full pay period – The total hours worked is divided by a factor of 2.15

Two full consecutive pay periods -- The total hours worked is divided by a factor of 4.3

Partial pay period -- The total number of hours worked is divided by the number of days worked to obtain a daily average. The daily average is multiplied by the number of actual days worked and verified in a seven consecutive day period. The pay period must cover a minimum of one consecutive seven day period.

The weekly average is entered into our tracking system for each week of the report month.

Self-Employment

An individual is self-employed if engaged in an enterprise for gain, either as an independent contractor, franchise holder, or owner-operator. This includes individuals working on a commission only, per-job or per-piece basis when hours are not supervised/tracked. (For example: a salesperson who receives only a percentage of their sales, a construction worker paid a flat sum for each house he frames **or** a housekeeper who is employed by a service and is paid based on the size and number of houses cleaned).

NOTE: When an employer is tracking hours of work it is not considered self-employment.

The number of hours of self-employment counted toward participation each month is determined by calculating the individual's gross earned income, less business expenses, divided by the federal minimum wage. A self-employed participant who states they are an independent contractor, franchise holder or owner-operator must complete, sign and submit a self-employment worksheet and provide substantiating documentation of the income and claimed expenses. ~~A participant who works commission only or on a contracting basis AND receives a paystub from the employer that does not indicate actual hours worked does not need to complete the self-employment worksheet.~~ The Division will report the number of participation hours **indicated on the self-employment worksheet** ~~derived~~ by dividing the gross income by federal minimum wage, not to exceed 40 hours per week. Acceptable documentation may include: quarterly/yearly income tax statements, business records, signed statements from individuals purchasing services, invoices and receipts. Determining participation hours in this manner is consistent with the Division's policy of determining income for TANF eligibility and benefit calculation. Self-employment hours may be projected. (See projection of income in Section I.1.b.)

Work in Exchange for In-Kind Income

Hours worked in exchange for in-kind income will be reported in this category when the following conditions are met: 1) The type of goods/services rendered in exchange for work, meets the TANF definition of 'in-kind' income and that income is budgeted when determining TANF eligibility and monthly benefit; 2) the work is assigned and hours verified in writing by the individual providing the in-kind income; 3) the number of hours reported will not exceed the value of the in-kind income divided by the federal minimum wage.

The Division budgets the value of work performed in exchange for basic needs as income when determining eligibility and benefit amount. Basic needs are defined as food, clothing, recreation, personal incidentals, fuel for heating, cooking and water heating, electricity for refrigeration and lights, household supplies, medical chest supplies and shelter. The Division requires a signed statement, from the individual providing the in-kind income, attesting to the work being completed, the in-kind income provided and the value of the in-kind service/goods. Work in exchange for

in-kind income may be projected. (See projection of income in Section I.1.b.)

Salaried Employees

When the employer tracks the hours of work completed in exchange for gain, hours of participation will be projected, as explained in Section I.1.b., based on frequency of payment.

When the Division verifies the employer does not track actual hours of work, the Division will report the number of participation hours derived by dividing the gross income by the federal minimum wage, not to exceed 40 hours per week.

Actual Hours - In all employment activities, the Division will verify and report actual hours when a participant's employment activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs
- Earning Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participants name, actual hours worked, wages and employer's signature, address and phone number.
- The Work Number® - an automated employee data warehouse service. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Self-Employment – Participant must complete and sign the Self Employment Work Sheet and provide documentation for the income and expenses claimed. Documentation may consist of quarterly/yearly income tax statements, business records, statements from individuals purchasing services, invoices and receipts. A participant working commission only or on a contracting basis who receives a paystub that does not indicate hours worked does not need to be complete the self-employment work sheet. The Division will report the number of participation hours derived by dividing the gross income by federal minimum wage, not to exceed 40 hours per week.
- Documented Phone Call – A documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision* - N/A

2. Subsidized Private and/or Public Sector Employment

a. *Description of Services*

Subsidized employment in the Private or Public Sector is defined as employment for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient. The recipient receives the same wages and benefits as an employee with no subsidy who performs similar work. The Division excludes on-the-job training programs with subsidies from this category.

At present, the Division does not financially participate in a subsidized employment program. TANF recipients may be placed in subsidized employment situations through the Division of Employment, Training and Rehabilitation, Universities (work study), Community Colleges (work study) or community agency providers. When TANF recipients are participating in subsidized employment opportunities, actual and/or projected hours of paid participation will be reported under this category. The Division will track and report hours of participation separately for private versus public subsidized employment.

b. *Determining Countable Hours*

Projecting Hours -- The Division will obtain verification of actual hours worked and report actual hours when verified. The Division will use an average of actual hours to project participation for up to six months in the future, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or becomes known, the Division will request verification and update the projection when received.

Unless otherwise specified actual hours of participation will be averaged as follows:
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- Two or more weeks of actual hours may be averaged by totaling the number of hours worked and dividing by the number of weeks. If a week is not representative of what is expected in the future, it will be dropped or adjusted when determining the average.

For example: If the individual worked an additional 8 hours in one pay period and this will not be representative of hours they are expected to work in future months, the 8 hours will be excluded when determining a best estimate for projected hours. This is consistent with our eligibility policy for projecting income.

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The weekly average is entered into our tracking system for each week of the report month.

Actual Hours - The Division will verify and report actual hours when a participant's activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs
- Earning Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participants name, actual hours worked, wages and employer's signature, address and phone number.
- The Work Number® - an automated employee data warehouse service. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Documented Phone Call – A documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is

incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision* - N/A

3. On-the-Job Training

a. *Description of Services*

On-the-Job Training is defined as training in the public or private sector given to a paid employee while he or she is engaged in productive work and provides the knowledge and skills essential to the full and adequate performance of the job. This category is limited to positions providing significant on-site training. An employer or other responsible party will supervise this activity daily.

The Division contracts with employers on a per recipient basis. The training period is negotiated with the employer based on their standard training period for like positions, not to exceed a 6-month period. The training program is stipulated in the individualized contract and differs by employer and type of occupation. As a general rule, the training will be of the same content and duration as any new employee would receive with the same employer for a like position. The Division may subsidize up to 50% of the wages received by the recipient during the training period.

On-the-Job Training sites are also available to our participants through the Division of Employment, Training and Rehabilitation (DETR). While the employment subsidy comes from a different funding source, the two Divisions work closely together to coordinate services for common clients. When a recipient is participating in such an arrangement and there is a significant on-site training component to the arrangement, the hours will be reported under this activity category.

b. *Determining Countable Hours*

Projecting Hours -- The Division will obtain verification of actual hours worked and report actual hours when verified. The Division will use an average of actual hours to project participation for up to six months in the future, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or becomes known, the Division will request verification and update the projection when received.

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The weekly average is entered into our tracking system for each week of the report month.

Actual Hours - The Division will verify and report actual hours when a participant's activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs
- Earning Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participants name, actual hours worked, wages and employer's signature, address and phone number.

- The Work Number® - an automated employee data warehouse service. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Documented Phone Call – A documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision* - N/A

4. Work Experience

a. *Description of Services*

Work Experience is defined as a work activity that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment performed in return for welfare benefits. The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment.

Community Work Experience Program (CWEP) --The Division contracts with public and non-profit agencies to provide Community Work Experience Program opportunities. The Division also sponsors participants internally. The contracts stipulate TANF recipients receive training, perform work duties and are supervised daily in exchange for the work they do for the sponsoring agency. The Recipient's work history, aptitude and future employment/career goals are matched to the needs of the sponsoring agency prior to placement. The Division provides worker compensation coverage and pays the monthly premiums for participants in this activity.

Work Activities as Assigned in a Residential Treatment Program -- Hours spent performing work-type duties as part of a residential treatment program for substance/alcohol abuse or shelter program for victims of Domestic Violence may be counted as work experience in this category if the participant fulfills assigned, supervised and documented work responsibilities for the benefit of all the residents, such as preparing meals, housekeeping or organizing group activities. Participation in a work experience or community service program is subject to FLSA regulations. Individuals will not be required to participate in these activities in excess of the number of hours derived by combining the welfare cash benefit and food stamp allotment and dividing by the applicable minimum wage.

The Division has adopted a "mini" Simplified Food Stamp Program to expand available hours for this activity and utilize the deeming provision permitted at 45 CFR §§ 261.31 and 261.32.

b. *Determining Countable Hours*

The Division will report actual hours of participation

Community Work Experience Program - CWEP worksite agencies sign the CWEP Work Experience Memorandum of Agreement Form 2680-WA. The Agreement stipulates daily supervision and documentation of attendance and hours on a timesheet. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.

In-house CWEP -- Divisional staff supervise, track and document participant hours.

- Residential Treatment Facilities – The residential facility will supervise and document all assigned work-type duties and hours on a timesheet and are required to submit the timesheet to the Division. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.

c. *Verification*

- E&T CWEP Time Sheet, Form 2690-WA and Participant Evaluation Report, Form 2689
- Sign-in/sign out sheets and/or time sheets are used to track participant hours for in-house CWEP activities.
- Time sheets are completed and signed by a representative of the residential treatment facility certifying the activities were assigned and supervised.

NOTE: The Division uses a variety of timesheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the recipient's name, type of activity, date of participation, actual hours of participation each day and the name and signature of the person completing the form.

d. *Supervision*

- The CWEP agreement stipulates the supervisory responsibilities of the sponsoring agency and the expectation to provide training, work skills and daily supervision.
- Participants engaged in in-house CWEP are assigned to a staff member who is responsible for providing training and daily supervision.
- Residential Treatment Facilities supervise and document all treatment and work activities performed by residents.

Case managers work closely with sponsoring agencies, treatment centers and in-house supervisors to ensure participants are engaged in meaningful activities and are gaining employable skills and behaviors. Case managers are available to assist in the resolution of work-place behaviors and/or conflicts.

5. Job Search/Job Readiness

a. *Description of Services*

This activity is defined as the act of seeking or obtaining employment and preparation to seek or obtain employment. This activity includes the time participants attend job clubs, job readiness classes, lifeskills training and other similar programs providing assistance with applications, interviews, resumes and other job search skills.

When determined necessary and a documented need for treatment or therapy by a medical, substance abuse or mental health professional exists, substance abuse treatment, mental health treatment and/or rehabilitation activities may be counted in this category.

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The Division will limit reporting participation hours in these activities to no more than six (6) weeks (or twelve (12) weeks when qualified as a needy-state) in a 12-month rolling period with no more than four (4) weeks consecutive per statutory provisions. A “week” of job search/job readiness activity is defined as 20 hours of participation for a work-eligible individual who is a single custodial parent with a child under six years of age and 30 hours for all other work-eligible individuals. Six weeks of job search/job readiness assistance equates to 120 hours and 180 hours. Or, if the state has been determined a needy state, twelve weeks of job search/job readiness assistance equates to 240 hours and 360 hours. Program staff will monitor our state’s eligibility status as a ‘needy state’ and will not report participation in excess of the 6 week limitation if our status changes. Our system is coded to count any week in which one (1) or more hours of activity is entered/reported in this category toward the consecutive time limitations. Staff will use discretion in reporting hours under this time-limited category to avoid using up the allowable weeks for part-time or episodic participation and conserve those weeks for weeks when the client will meet their work requirement. Only actual hours of participation will be reported. Participation is monitored and supervised by DWSS staff and verification of participation hours must be received prior to reporting hours in the NEON Calendar. Hours of participation in the following activities are reported in this category:

- Assessments – A variety of assessment tools are used by case managers and social workers to determine the participant’s employment readiness and identify barriers to obtaining and maintaining employment. Staff may document the hours spent with the client in these activities in the case record and report actual hours in the system. Examples of assessments include a job readiness screening (work history and identifying possible employment barriers like transportation, childcare, domestic violence situation), psycho-social assessment, TABE (math/reading test), Fetal Alcohol Affect Screening, alcohol and substance abuse screenings, occupation aptitude testing, vocational rehabilitation assessment, etc.

- **Counseling/Treatment (Domestic Violence, Mental Health, Substance Abuse)** – When determined necessary and a documented need for treatment or therapy by a qualified medical or mental health professional exists, substance abuse treatment, mental health treatment or rehabilitation activities are counted in this category. TANF Recipients are screened for domestic violence, mental health and substance abuse issues and referred to Divisional Social Workers if they declare or are suspected to have one of these issues. Social workers are licensed and trained to administer a variety of non-medical assessment tools to further substantiate a need for services. When indicated, recipients receive referrals to contracted providers. Mental health and substance abuse treatment providers are required to provide a recommendation for treatment and treatment plan if they concur the applicant has need of their services. (Note: Reporting domestic violence counseling participation is limited to counseling that constitutes mental health treatment.)
- **Other rehabilitative services** – Vocational Rehabilitation Services may be counted in this category. Example: An evaluation of mental/physical ability to perform different types of job duties for an individual who must be trained for a new occupation when they are no longer able to perform the job duties of their previous occupation. The provider will supervise and document all hours of participation in this activity and submit it to the division. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- **Job Preparedness** – This activity includes resume preparation, job clubs, practicing interviewing skills, working out the logistics of a job search plan (location of employers in relation to public transportation availability and child care centers), instruction in work place expectations, etc.
- **Job Search** – This activity includes searching for job openings, applying with potential employers and interviewing for positions. The State of Nevada has an interagency/community partnership network of JobConnect Career Centers. Job seekers enter their job experience and job skills into JobConnect's Information system and the job seeker is able to search for job openings for which they qualify. Many major employers now require online applications and the JobConnect Centers provide the computers and technical support for job seekers to email their resume and applications to employers. The actual time spent registering in the system, searching for openings, obtaining referrals from JobConnect staff and applying online will be countable participation hours under this category.
- **Life Skills** – The Division contracts with lifeskill training providers on behalf of our recipients.

b. *Determining Countable Hours*

Actual hours of participation are reported in this category.

c. *Verification*

- The time a recipient participates in in-house assessments is tracked and documented by Divisional staff.
- In the case of substance abuse treatment, recipients are referred to a SAPTA (Substance Abuse Prevention and Treatment Agency) qualified alcohol/substance treatment agency for evaluation and treatment recommendations. Time sheets provide written documentation of the recipient's participation in treatment. Hours are tracked and submitted by the treatment agency a minimum of once per week.
- A qualified mental health professional is defined as a "Medicaid Approved Provider" of mental health services. The Division of Health Care Financing and Policy, which administrates the Medicaid services program in Nevada, establishes the certification and licensing standards. The mental health provider will be required to complete and sign a Report of Illness/Incapacity Form indicating type, duration, and frequency of treatment. Time sheets provide written documentation of the recipient's participation in treatment. Hours are tracked daily and submitted by the treatment agency. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- Job Preparedness Activities - Recipients will be required to maintain time sheets which must be signed by the contractors, instructors, advisors, mentors and other responsible third party individuals when participating in job preparation classes/clubs and provide these to their case managers. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- Job Search - Recipients will be required to keep a time sheet documenting where, when, and with whom they participated in these activities on a daily basis. Reportable hours will begin when the recipient reports to their district office or to the first prospective employer and will end when the activity is concluded. Time traveling between prospective employers will be reported. Time spent at lunch or other breaks will not be reported. Staff will validate at least two random contacts reported each week. If the contact records are found to be valid the hours of recorded participation may be reported. If staff is unable to validate the recorded hours, the participation hours documented on the time sheet will not be reported. Staff will be available during all regular business hours to provide assistance and guidance for these activities. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- Life skill providers will maintain daily attendance and hourly participation records on a time sheet and provide them to the case manager. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.

NOTE: The Division uses a variety of timesheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum,

time sheets must provide the recipient's name, type of activity, date of participation, actual hours of participation each day and the name and signature of the person completing the form.

d. *Supervision*

- Case managers supervise self-directed job search and job preparedness activities.
- Contracted life skill training providers are responsible for supervising recipients referred to them for the duration of the course. (Usually 2-4 weeks)
- Divisional Social workers closely monitor the treatment plan and activities of recipients receiving domestic violence, mental health and substance abuse treatment/services.

6. Community Service Program

a. *Description of Services*

Structured programs and embedded activities in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service programs must be limited to projects that serve a useful community purpose in fields that include but are not limited to health, social service, environmental protection education, urban and rural redevelopment, welfare, recreation, public facilities, public safety and childcare. Community service programs are designed to improve the employability of recipients not otherwise able to obtain employment, and must be supervised on an ongoing basis. The responsible party should have daily responsibility for oversight of the individual's participation. Daily, in-person contact with the participant is not necessary. The Division shall take into account, to the extent possible, the prior training, experience and skills of a recipient in making appropriate community service assignments.

Community service sites are developed specifically for each individual's skills and interests. These sites have been developed at schools, thrift stores, senior centers, libraries, food pantries and community service agencies. These placements are expected to provide an opportunity for personal growth (interpersonal skills, conflict resolution, responsibility, work-like routine) for individuals who are not ready for employment. The recipient, agency and case manager mutually agree upon structured activities.

Participation in a work experience or a community service program is subject to FLSA regulations. Individuals will not be required to participate in these activities in excess of the number of hours derived by combining the welfare cash benefit and food stamp allotment and dividing by the applicable minimum wage.

Exception: Court ordered community service is not subject to FLSA standards as the recipient is not being asked to participate in exchange for a TANF benefit.

The Division has adopted a “mini” Simplified Food Stamp Program to expand available hours for this activity and utilize the deeming provision permitted at 45 CFR §§ 261.31 and 261.32.

b. *Determining Countable Hours*

Actual hours of participation are reported.

c. *Verification*

Time sheets are completed by a representative of the sponsoring agency to track daily participation. Documentation must be available in the case file to support all actual hours of participation documented in the NEON Calendar each month.

NOTE: The Division uses a variety of timesheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the recipient’s name, type of activity, date of participation, actual hours of participation each day and the name and signature of the person completing the form. Electronic records provided by the sponsoring agencies with the above information are acceptable.

d. *Supervision*

The case manager makes arrangements for a representative of the sponsoring organization to provide daily supervision.

7. Vocational Educational Training (not to exceed 12 months with respect to any individual)

a. *Description of Services*

Vocational Educational Training is defined as organized educational programs directly related to the preparation of individuals for employment in current or emerging occupations requiring training or education leading to a baccalaureate or advanced degree would be included in this section. Vocational educational training is limited to training programs that provide individuals with the knowledge and skills to perform a specific occupation. **If a work-eligible individual already possesses the education, skills, experience and training necessary for gainful, sustainable employment in their geographical region the Division will focus efforts on employment in the specific field the individual is trained and not additional training or education.**

Basic skills education or ESL may count under this category as long as it is a necessary or regular part of the vocational education training program. The instruction must be directly related to a specific occupation. Training must be provided by an educational or training organization. Vocational education provided in high school or

leading to a certificate of general equivalence is not countable in this category.

Supervised homework time is counted in this activity. In addition, up to one hour of unsupervised homework time for each hour of class time may be counted.

English as a second language (ESL) instruction and adult basic education is not reported under this category, unless it is a mandated component of the vocational training curriculum. The following are two examples where ESL and adult basic education is 'embedded' in the curriculum:

- Job Corp – a no-cost education and vocational training program administered by the U.S. Department of Labor that helps young people ages 16 through 24 get a better job, make more money, and take control of their lives. Participants have a wide range of career training options. In Nevada, the program requires young adults to pursue their high school diploma or GED in conjunction with the vocational training.
- Culinary Training Academy – Provides training for the service industry such as training for bus person, waiter, wine steward, kitchen prep, fry chef, chef, guest room attendant, shampoo porter, etc. Non-English speakers are required to complete work place English as a component of their individualized training program to ensure they can understand employer instructions and communicate safety issues. Training programs range from 4-24 weeks depending on the program and the Academy has an excellent track record of placing successful graduates into immediate employment.

Distance Learning – Distance learning (as opposed to self-study) where students are not in the same physical location as the instructor is considered formal training under this activity. Most often, the student uses a computer and course software to participate in class. Students can have direct interaction with teachers and other students through internet access.

b. *Determining Countable Hours*

Actual hours of participation are reported.

The case manager may document self-reported hours of participation in an educational institution if he or she has ongoing contact with the participant. Ongoing contact for reporting purposes is monthly contact which can be either in person, by telephone or electronic (email) and must be documented.

Monitored study sessions where hours of participation can be documented will be reported in this activity. One hour of unsupervised homework time may count for each hour of classroom or distance learning time. Hours cannot exceed the hours required or advised by a particular educational program.

No more than 12-months of Vocational Education will be reported for any individual. Nevada's system is coded to count any month with one (1) or more hours of

participation entered/reported in this activity as one month toward the 12-month time limit. Staff will use discretion in reporting hours under this time-limited category to avoid using up the allowable months for part-time or episodic participation and conserve those months for weeks when the client will meet their work requirement.

c. *Verification*

- Time sheets are maintained by the client and/or instructor and are signed by the instructor or other authorized representative of the training institution or official school/institution time and attendance records.
- The case manager may document hours of participation if he or she is in ongoing contact with the participant and has adequate evidence the individual is making satisfactory progress. Note: If the recipient fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the case manager must subsequently make use of a heightened standard of verifying hours of education, e.g. requiring signed attendance sheets with third-party verification.
- Contracted training vendors submit attendance and participation hours via fax or email. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- The Division may make space available for clients to use for completing study/homework. This time will be monitored and documented ~~daily~~ by Divisional staff.
- For unsupervised homework, a statement from the educational program indicating the amount of homework required should be located in the file.
- In cases where the individual is participating in a distance learning program, via internet or video conferencing, documentation issued by the distance learning institution verifying that the student attended the session is acceptable verification. This documentation may include the attendance records or log-in and log-out records available on-line or in an electronic format.

NOTE: The Division uses a variety of timesheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the recipient's name, type of activity, date of participation, actual hours of participation each day and the name and signature of the person completing the form.

d. *Supervision*

Daily supervision will be provided by the educational/training provider, which is monitored by Division staff. Or, daily supervision by Division staff if he or she is in ongoing contact with the participant and has adequate evidence the individual is making satisfactory progress.

The division may make space available for clients to use for completing study/homework.

8. Child Care

a. *Description of Services*

Providing childcare to enable another TANF recipient to participate in a community service program as defined in #6 above.

NOTE: The Division has not developed a qualifying Child Care program. The Division continues to consider this as an option for the future and will amend the plan when and if a program is developed.

9. Job Skills Training Directly Related to Employment (non-core)

a. *Description of Services*

Training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. The case manager must document the employment requirement and purpose for training.

The Division does not develop specific programs/services in this category, but is able to access training opportunities provided by employers, technical schools, universities and community colleges via individualized training contracts with participants and/or the training institutions. Types of training reportable under this category include:

- Vocational education training extending beyond the allowable 12-month Vocational Education Category limitation;
- Basic skills and remedial training for adults when focused on the skills needed for employment.

b. *Determining Countable Hours*

Actual hours of participation are reported.

Monitored study sessions where hours of participation can be documented will be reported in this activity. Up to one hour of unsupervised homework time for each hour of class time may be counted for participation in this activity. Time counted for participation cannot exceed the hours required or advised by a particular education program.

c. *Verification*

Time sheets are maintained daily by the client and/or instructor and are certified by

the signature of the instructor or other authorized representative of the training institution (school or vendor) to verify official time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division staff.

The division may make space available for clients to use for completing study/homework. This time will be monitored and documented by staff.

10. Education Directly Related to Employment (non-core)

a. *Description of Services*

Education directly related to employment is defined as education related to a specific occupation, job, or job offer in the case of a recipient who has not received a high school diploma or GED. The case manager must document the occupation, job or job offer for which the participant is receiving training. Examples of training that may be reported in this category include:

- Adult Basic Education
- English as a Second Language (ESL)
- General Equivalency Diploma

b. *Determining Countable Hours*

Actual hours of participation are reported.

Monitored study sessions where hours of participation can be documented will be reported in this activity. Up to one hour of unsupervised homework time for each hour of class time may be counted for participation in this activity. Time counted for participation cannot exceed the hours required or advised by a particular education program.

c. *Verification*

Time sheets are maintained daily by the client and/or instructor and are certified by the signature of the instructor or other authorized representative of the training institution or official school/institution/vendor time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division staff.

The division may make space available for clients to use for completing study/homework. This time will be monitored and documented by staff.

11. Regular Attendance at Secondary School or in a GED Program (non-core)

a. *Description of Services*

Regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a work-eligible individual who has not completed secondary school or received such a certificate. The educational/training institution defines regular progress.

b. *Determining Countable Hours*

Actual hours of participation are reported.

Monitored study sessions are reported. Up to one hour of unsupervised homework time for each hour of class time may be counted in this activity. NOTE: Total unsupervised homework time counted for participation cannot exceed the hours required or advised by a particular educational program.

c. *Verification*

- Time sheets maintained daily by the client and/or instructor and certified by the signature of the instructor or other authorized representative of the training institution or official school time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON Calendar.
- For unsupervised homework, a statement from the educational program indicating the amount of homework required should be located in the file.
- If a participant is attending high school, a written statement from the school regarding attendance.

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division staff.

The division may make space available for clients to use for completing

study/homework. If time exceeds the number of hours required or advised by a particular educational program it must be monitored and documented by staff.

II. HOURS ENGAGED IN WORK

1. Excused Absence

Holidays - Work-eligible individuals who are unable to participate in an unpaid activity due to one of the following holidays may be credited for the hours they would have otherwise been scheduled to participate.

1. New Years Day
2. Martin Luther King
3. Presidents Day
4. Memorial Day
5. Independence Day
6. Labor Day
7. Veterans Day
8. Thanksgiving Day
9. Nevada Day (Observed on the last Friday of October.)
10. Christmas

Example: A recipient is scheduled to participate in a work experience site Monday thru Friday, six hours per day. Monday is a federal holiday and the office will be closed. The recipient will be credited six hours towards their work requirement and these hours will be reported by the Division.

Excused Absence – Recipients will be allowed up to 80 hours of excused absence from unpaid work activities within a rolling 12-month period. This rolling period begins October 6, 2008. No more than 16 hours of unpaid excused absences will be allowed in a work participation rate [WPR] report month. Unpaid excused absences are allowed on a case-by-case basis, providing the recipient follows the supervisor's policy for reporting the absence and the reason for the absence would be commonly acceptable to an employer. Example of acceptable reasons: Illness, illness of a child/family member, death of a family member, doctor/dentist appointments, parent-teacher conferences, jury duty, and court ordered activities. Short periods of treatment for substance abuse, mental health or rehabilitation

activities can be counted under this category. Only the hours the participant was scheduled to work will be allowed as excused and reported under this category. Whether to grant an excused absence is in the Division's sole discretion and is not an entitlement of the recipient.

2. FLSA Deeming

The Division has adopted a "mini" Simplified Food Stamp Program to expand available hours for this activity and utilize the deeming provision permitted at 45 CFR §§ 261.31 and 261.32.

Deeming:

When deeming core hours, the Division bases the hours of participation on the monthly TANF and food stamp benefit divided by the greater of the federal or state minimum wage. If the recipient participates up to the maximum number of hours allowed under FLSA limitations and it is less than 20 hours, the Division will report deemed hours to bring the total hours of participation for the activity up to 20 core hours. If the recipient does not work up to the maximum number of hours allowed, only the actual hours of participation will be reported.

III. WORK-ELIGIBLE INDIVIDUAL

1. Identifying all Work-Eligible Individuals

The Division's TANF eligibility system, Nevada Operations of Multi-Automated Data System [NOMADS], is programmed to identify all adults and minor child head-of-households. The system treats minor parents who are not the head-of-household and not the spouse of the head-of-household as children. Policy requires staff to enter demographic data for all parents in the household regardless of their eligibility for the program. The employment and training case management system, On-line Automated Self-Sufficiency Information System [OASIS], opens a case for each individual with a work eligible code. Supervisors receive an automated list of the new cases each day, which they then assign to employment and training case managers.

The following individuals are excluded from the definition of work eligible individuals:

- A. Minor parents who are not the head-of-household or the spouse of the head-of-household;
- B. Non-eligible aliens;
- C. SSI and SSDI recipients;
- D. Parents caring for a disabled family member who is living in the home.
For the purposes of this provision, the term "disabled" is defined as any individual who is medically certified by a physician as requiring assistance for basic medical, personal, or safety needs. The physician is expected to estimate the expected duration of temporary disabilities and staff will be required to review the household

circumstances and ensure parents are coded as mandatory when the disability criteria for the family member is no longer met. The term “family member” is defined as any individual related by blood or marriage to a member of the TANF household.

- E. Members of a tribal TANF program- these individual are not in our system and will not be included in the WPR;

The following individuals are identified and coded as work eligible as indicated below:

- A. Intentional Program Violation [IPV] disqualified individuals - IPV individuals have always been included in Nevada’s WPR as they are considered TANF recipients even though their household TANF benefits may be reduced by a pro-rata share;
- B. Sanctioned individuals - The division’s policy on sanctions is to terminate assistance for the entire household, if the work eligible individuals are not cooperating with work requirements by the end of a conciliation period. During the conciliation period, individuals are eligible for assistance and included in the WPR;
- C. Disqualified individuals – Drug felons, fleeing felons, parole violators and minor parents who are not meeting their school requirements for eligibility are disqualified from TANF assistance. Work mandatory codes are already established in the NOMADS system for identifying these individuals for the purposes of eligibility.

Effective October 1, 2006, the Division has only one group of TANF households included in a Separate State Maintenance of Effort Program. The group consists of non-qualified aliens, who are currently barred from federal assistance for 5 years from entry, but who are in a domestic violence situation and have successfully petitioned for residency under the Violence Against Women Act. They are coded as work mandatory if they meet the definition of a work eligible individual.

Correctly identifying “work eligible individuals”, entering correct participation hours into the system, and ensuring participation hours are verified and documented according to policy will all be review elements in case manager performance reviews, internal quality control [QC] reviews, and management evaluation reviews. Through these case reviews any data discrepancies being identified will be corrected in the Federal databases and retransmitted to Health and Human Services. Structured Query Language (SQL) queries are executed to eliminate any data inconsistencies between two or more data elements. These queries include any data inconsistencies between “type of family” and “work participation status” data elements. Nevada also validates, corrects and retransmits the corrected data inconsistencies that are reported on the inconsistency reports received from ACF on a quarterly basis. Again, any data discrepancies identified through either the case reviews or SQL queries are corrected in the Federal databases and retransmitted to Health and Human Services.

2. Verification Procedures for Identifying Work-Eligible Individuals

DWSS’ eligibility computer system is known as NOMADS. NOMADS is an on-line data entry system to a master database. All TANF as well as SSP-MOE cases reside in the master

database including active, newly approved and closed cases. These cases are identified with aid codes to distinguish the child only cases, one-parent cases and two-parent cases.

Nevada has an automated extraction process with built in logic to identify and extract TANF families from NOMADS. These TANF families are included in the sample reporting month. Based upon the Federal regulation's description of work eligible individuals, these cases are identified and computer program logic is coded to include or exclude all work eligible individual adult (or minor child head-of-household) family members. Computer logic is validated and system tested by Information Systems program staff. Work eligible individuals are included in the TANF Data Report and the SSP-MOE Data Report.

3. Capturing and Reporting of Work-Eligible Individual Data

Along with NOMADS, the State also uses an employment and training computer system known as OASIS in capturing work eligible individuals and work volunteer individuals information. OASIS establishes a Participation Calendar for every work eligible individual in which validated (see Section 1, Countable Work Activities for Verification processes) countable work activities and activity hours are entered by DWSS staff. The Participation Calendar calculates and tracks the countable work activity hours, including excused absences and holiday hours, entered for each calendar month. To ensure the countable activities and work activity hours are reported correctly, program coding is validated and system tested by Information Systems program staff.

IV. INTERNAL CONTROLS

This section addresses the internal controls for Nevada's TANF Data Reporting population in order to ensure a consistent measurement of the WPR.

1. Established Work Verification Procedures

Beginning FFY07, Nevada's TANF Data Reporting unit implemented audits on case file documentation and system reviews in order to validate and ensure work verification regulations are being met. These audits consist of a sub-sampling from the TANF data report month sample frame. The unit validates case file verifications against data input into Nevada's NOMADS and OASIS computer systems. The OASIS system contains work participation information, including work activity records, activity hours and supportive services payments used in calculating the WPR. DWSS staff validates employment matches using a web based State Directory of New Hire program called "Automated Nevada Server-based Reference System" (ANSRS). 'NOMADS' computer system interfaces with Employment Security Division (ESD) and alerts are generated to DWSS staff when new or updated employment data is matched. Case circumstances are also validated to ensure Nevada is capturing and reporting on all work eligible individuals. All hard copies of case files and documentation used in work participation validation are stored for the duration of the mandated administrative period. (The mandated administrative period has been defined as 3 years after submission of the final expenditure report for the Federal Fiscal year.) These

files will be retained and made available for inspection by the Administration for Children and Families [ACF] and other auditors, as needed.

2. Controls for Data Errors, Coding Errors, Data Omissions, Computational Errors and Compilation Errors

Nevada's automated extraction process from NOMADS and OASIS ensures we are capturing required TANF data reporting elements on a consistent basis. The majority of data elements are extracted from the NOMADS and OASIS systems and built into a flat file for import into the FTDRS and SSP-MOE Federal software. DWSS fully populates the FTDRS with all known information. When necessary, field staff obtains data by researching the case files or through direct client contact.

Monthly samples are monitored, by performing case file and system audits, to validate and ensure work verification regulations are being met. Work verification activities as defined in section I.5 are being met through these case file and system audits. If data validation problems are identified using secondary verifications, these hours will not be reported unless verified. Only verified and documented actual hours of participation will be reported.

3. Electronic Systems and Programming Error Validations

In order to meet Federal and State regulations addressing work participation for FFY09, computer system changes are required. These required changes are documented in a System Requirements Document (SRD) and discussed thoroughly before assignment to the Information System [IS] program staff. The IS programmers code any required system changes into NOMADS and/or OASIS. Once these code changes are complete, IS system testers validate the system changes, before promoting to production, based upon what is documented in the SRD. This validation includes creating a bed of test cases and manually calculating the WPR data prior to testing. Once the cases in the test bed are actually entered in the system and reports created, the automated results are compared to the manual results to validate accuracy. This ensures programming errors are being addressed and any computer system changes are being met.

4. Sampling and Estimation Techniques Employed in Data Validation

SAMPLING METHOD

The sample size requirements for active and closed cases in the twelve month reporting period is specified in TANF Sampling and Statistical Methods Manual, Section 1411, Sample Size Requirements for the TANF Active Sample and Section 1412, Sample Size Requirements for the TANF Sample of Closed Cases as follows:

A. Active Cases

The minimum required annual sample size for the active TANF sample is 3,000 completed cases. The 3,000 cases must consist of at least 1,800 ongoing single-parent/child only cases, 600 two-parent and 600 newly approved cases. Nevada will pull the minimum required annual sample size plus ten percent to take into

account listed in error cases.

Nevada will pull 100% sample size for SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

B. Closed Cases

The minimum required annual sample size for the sample of closed TANF cases is 800 cases each. Nevada will pull the minimum required annual sample size plus ten percent to take into account listed in error cases. The closed TANF cases will be a mixture of single parent, two-parent and child-only cases.

Nevada will pull 100% sample size for SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

C. Stratification

The active TANF population will be stratified into three strata: On-Going All-Family (stratum code 88), On-Going Two-Parent (stratum code 80) and Newly Approved (stratum code 81). Each month a random sample will separately be selected from stratum 88, stratum 80 and stratum 81. These three separate samples constitute a stratified simple random sample for the active TANF population.

Nevada will pull 100% sample size for SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

SAMPLE SELECTION PROCEDURES

The following sample selection procedures will apply to TANF reporting unless otherwise noted.

Active Cases

1) Estimate Caseload Size For Each Stratum

The TANF monthly average number of cases for a stratum should be estimated on the basis of past caseload sizes and trends. The division's Coordinator of Research and Statistics is responsible for these estimates. Typically, simple linear trend projection models are used for caseload estimates. However, any known circumstances, such as policy or economic changes that would considerably change caseload sizes, also should be taken into account in making the estimate.

The average monthly caseload for each stratum will be estimated before the beginning of the annual sample period. The estimated average monthly caseload for stratum j will be denoted by N_j' .

2) Determine Sample Size For Each Stratum

For TANF, the minimum required sample sizes of completed cases for the three active strata are:

	Annual Completed	Annual Selected (assuming 10% drop rate)	Monthly Selected (n_j')
All Family Cases	1,800	2,000	167
Two-Parent Cases	600	667	56
Newly Approved Cases	600	667	56
Closed Cases	800	888	74

Nevada will pull 100% sample size for SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

3) Compute Sample Interval For Each Stratum

The sample interval for stratum j (denoted by I_j) is obtained by dividing the estimated average monthly caseload for stratum j by its required monthly selected number, i.e., $N_j' \div n_j' = I_j$. The sample interval I_j is only to be used for deciding the number of sample cases to be selected from the j th stratum, not for selecting individual sample cases as in a systematic random sampling.

4) Select Monthly Sample

For each sample month, divide the actual stratum size for the j th stratum (N_j) by its sample interval obtained in (3) above, i.e., $N_j \div I_j = n_j$. This is the number of sample cases to be randomly selected from the j th stratum for the sample month.

Note 1: N_j' is the estimated average monthly caseload for the j th stratum. N_j is the actual caseload for the sample month for the j th stratum

Note 2: Step (1) above is done only once before the sampling period (annually), unless correction for under-sampling is needed (see Section 4). Step (4) above is done monthly; the actual monthly caseload for the j th stratum may vary from month to month, but the sample interval I_j remains the same throughout the year unless correction for under-sampling is needed.

Note 3: The monthly caseload for each stratum should be monitored closely. If the actual caseload for the j th stratum (N_j) is greatly different from the estimated average

monthly caseload (N_j'), under- or over-sampling may have occurred. In such a situation, correction for under- or over-sampling may have to be taken (see Section 4 below)

The above procedures provide for a self-weighting sample for the annual data for each of the three TANF strata (88, 80 and 81).

In the month of June, the sample data will be re-evaluated to determine if the minimum sample size requirements are being met for the year. If any of the TANF strata do not meet the minimum required sample size, the sample interval will be changed/shortened to correct for under-sampling. If this occurs, a new stratum will be created and a new stratum code will be assigned to the stratum that has the new sample interval.

Cases may be selected into the sample for more than one month during the sampling period. When this occurs, the case information for the sample month will be reported each time the case is pulled.

Cases could also be selected into different strata within the same reporting month, i.e., a case pulled as TANF Closed and SSP-MOE Active. When this occurs, the appropriate case information will be reported for each stratum in different populations (namely, the TANF Closed and SSP-MOE Active).

Active cases are reviewed as receiving cash when the manual information is gathered and input. All cases identified with zero TANF grants are manually reviewed and if determined a case did not receive cash in the report month, it is listed in error.

Closed Cases

Procedures for sampling closed cases are the same as for active cases, detailed above.

Section 4 - Correction of Over/Under Sampling

Over Sampling

Nevada chooses not to correct over-sampling.

Under-Sampling

In the sample selection procedures subsection, a sample interval for each stratum, which depends on an estimate of the average monthly caseload and the drop rate for the coming year, is used to determine the number of sample cases to be selected for each coming month. It is recognized that erring on the side of underestimating the caseload size is helpful in avoiding under-sampling.

If the average monthly caseload and/or the drop rate for the coming year is not accurately estimated, or if the caseload considerably changes due to unforeseeable factors, the number of selected sample cases may be significantly less than what is required. In this situation, Nevada will opt to correct for under-sampling in the last quarter of the federal fiscal year. Sometime in June, the state will re-estimate the average monthly caseload for the remaining

three months, calculate the number of sample cases that need to be selected to meet the requirement and re-compute a new sample interval, which will be used to decide the number of sample cases to be randomly pulled from each of the remaining three months. This will only be done for the stratum that is likely to be under-sampled.

Each time a new sample interval is used for selecting samples, it automatically creates a new stratum, and a new stratum code will be assigned. For example, if an interval change is made due to under-sampling, for strata 88 and 81 for the last quarter, the stratum codes for the last quarter would change to 89 from code 88 and 82 from code 81 (a total of four active stratum codes for the year; namely 88, 81, 89 and 82). Nevada will provide ACF with the correct stratum codes and stratum sizes in Section 4 of the Data Report.

Section 5 - Estimation and Variance

The stratified random sampling in this plan is mainly to obtain data to estimate the Work Participation Rates (WPR), to profile/estimate recipients' characteristics, and, of course, to meet the reporting requirements. There are different estimators that can be used to estimate the population parameters such as the mean, total, and proportion of population units that have certain characteristics. In this section, only two frequently used estimators and their variances will be provided.

1. Standard Estimator

$E1 = \sum_i^L W_i y_i$ where $W_i = N_i / N$; and $N = \sum_i^L N_i$, and y_i is the sample mean for the i th stratum, i.e., $y_i = \sum_j^{n_i} Y_{ij} / n_i$.

$E1$ is an unbiased estimator of the population mean (Y), and its variance is given as $V(E1) = \sum_i^L W_i^2 (1 - f_i) S_i^2 / n_i$ where $W_i = N_i / N$; $f_i = n_i / N_i$; and $S_i^2 = \sum_j^{n_i} (Y_{ij} - Y_i)^2 / (n_i - 1)$, the population mean square error of the i th stratum, which can be estimated from a sample.

Based on a sample, $E1$ can be used to estimate the population mean of a variable such as earned income, subsidized childcare, housing, etc. In combination with its variance, $E1$ can also be used to test a hypothesis of significant difference for this variable between two ethnical groups for example, or make other statistical inferences.

Comment 1: In this estimator, if multiplying $E1$ by N on the right side of the equation, then we would estimate the population total.

Comment 2: If the sample is self-weighting, then $n_i = n * N_i / N$, where $n = \sum_i^L n_i$ and $E1$ becomes $\sum_i^L \sum_j^{n_i} Y_{ij} / n$, which is a simple sample mean (W_i disappears). Its variance $V(E1)$ becomes $((1-f)/n) \sum_i^L W_i S_i^2$, where $f = n/N$; this is the variance if sampling is proportional. Both estimator and its variance become simpler; this is an advantage to having a self-weighting sample.

2. Combined Ratio Estimator

$E2 = \sum_i^L W_i y_i / \sum_i^L W_i x_i$ where $W_i = N_i/N$; y_i is the sample mean of Y_{ij} for the i th stratum, i.e., $y_i = \sum_j^{n_i} Y_{ij} / n_i$; and $x_i = \sum_j^{n_i} X_{ij} / n_i$.

$E2$ is not unbiased, but it is a consistent estimator of the population ratio Y/X . The bias diminishes as the sample size increases. Its variance is approximately given as: $V(E2) = (1/X^2) \sum_i^L (W_i^2 (1-f_i) / n_i) (S_{y_i}^2 + R^2 S_{x_i}^2 - 2R S_{xy_i})$ where $W_i = N_i/N$; $R = Y/X$ the population ratio; $S_{y_i}^2 = \sum_j^{N_i} (Y_{ij} - Y_i)^2 / (N_i - 1)$ the population mean square of Y_{ij} for the i th stratum; $S_{x_i}^2 = \sum_j^{N_i} (X_{ij} - X_i)^2 / (N_i - 1)$; and $S_{xy_i} = \sum_j^{N_i} (X_{ij} - X_i) * (Y_{ij} - Y_i) / (N_i - 1)$ the population cross-product term for the i th stratum.

$E2$ can be used to estimate a population ratio and proportion (percentage). The Work Participation Rate estimate is a special case of $E2$ when Y_{ij} and X_{ij} are the indicator variables (i.e., assuming either 1 or 0 value).

Comment 1: If the Division multiplies $E2$ by the population total of the x -variable (X) on the right side of the equation, it would estimate the population total of y -variable (Y).

Comment 2: The small letters y and x indicate sample means/totals; and the capital Y and X are for the population or stratum means/totals.

Section 6 – Audit Sample Size

For FFY07, Nevada's audit sample size was 50% of the active TANF data report sample frame. For FFY08, Nevada's audit sample size will remain at 50% of the active TANF data report sample frame. For FFY09, the Division anticipates Nevada's audit sample size to remain at 50% of the active TANF data report sample frame.

V. VERIFICATION OF OTHER DATA USED IN CALCULATING THE WORK PARTICIPATION RATES

1. Nevada's Data Validation Procedures

The NOMADS master database contains the master files, payroll information and eligibility information for all TANF and SSP-MOE cases. Information included in these files are case name, case number, monthly eligibility/non-eligibility information, most all the data element information used in calculating the WPR, as well as other information needed to fulfill the data reporting requirements.

The OASIS system contains work participation information, including work activity records and supportive services payments used in calculating the WPR.

To fully extract information necessary for TANF data reporting, both systems are utilized.

The case information for the data elements below are identified and extracted from either NOMADS or OASIS. The criteria used to ensure we are capturing these data elements are based upon Federal and State regulation requirements. Nevada has identified and programmed these mandated changes into NOMADS and OASIS. This program logic is validated and system tested by Information Systems program staff.

Reporting month – Captured from NOMADS system. This is the date of the “sample” reporting month. Only TANF cases having a TANF cash benefit issued are captured and reported in the reporting month.

Stratum – Nevada's stratums for TANF and SSP-MOE are predefined under 'Internal Control's' section of this document.

Case Number – The case number is the head of household's social security number. This number is validated by the case worker and is extracted from NOMADS when the universe pull is done.

Disposition – All of our sample cases have an auto default of 'Data collection completed' at the time data is extracted from NOMADS. After case audit reviews, SQL queries and system validations are complete is when it may be determined that the case is 'Not subject to data collection/listed in error'. Examples of cases listed in error could be a case that was pulled into the incorrect stratum or a benefit was issued in a month when the case was closed.

Type of Family for Work Participation – Cases are identified based upon the new Work Eligible Individual Indicator (WEII) codes. Adults having WEII codes of 1-5 are required to participate in work activities. Adults having WEII codes of 6 - 12 are exempt from work activities. Once these adults are identified determines which type of family for work participation the case will fall under. This can be a 1 parent, 2 parent or child only case based upon the work eligible exemptions.

Amount of Food Stamp Assistance – This data is extracted directly from the NOMADS system based upon any Food Stamp allotment amounts received in the sample reporting month.

Receives Subsidized Child Care – Child care data is imported into OASIS and is stored in an internal system table for data extraction purposes only. The total amount of subsidized child care the recipient received in the report month is extracted and reported in this field.

Amounts of TANF (and SSP-MOE) Assistance - This data is extracted directly from the NOMADS system based upon the TANF/SSP-MOE dollar amounts received, the sample reporting month.

Family Affiliation Code – Data is populated based upon the eligibility for TANF cash assistance of the household members, relationship codes, citizenship and SSI income of the household members.

Non-custodial Parent Indicator – Nevada’s default value for this field is 2 - No, not a non-custodial parent. Nevada does not provide assistance for non-custodial parents.

Date of Birth (Adult) – This date is validated by the case worker and is extracted from NOMADS when the universe pull is done.

Relationship to Head-of-Household –NOMADS has relationship code tables, the workers select from one they have identified and validated the relationship of the household members to the head of household. These codes are mapped to the Federal codes for identifying the relationships to the head of household.

Parent with Minor Child – Once the case has been identified as a 1 parent, 2 parents or child only case through the Type of Family for Work Participation process, this field is coded accordingly.

Work-Eligible Individual Indicator – Below are the WEII codes Nevada applies or disregards:

- 1 – Yes, an adult (or minor child head of household) receiving assistance
Adults having eligibility code of 1 (receives cash assistance)
- 2 – Yes, a non-recipient parent due to a sanction
Nevada closes a case for non-coop thus sanctions do not apply at this time.
- 3 – Yes, a non-recipient parent due to a time limit
Nevada closes a case if applicant exceeds their time limits
- 4 – Yes, a non-recipient parent receiving SSI, SSDI, or Adult Program assistance (aid to the needy aged, blind and disabled in the Territories) or a recipient parent receiving SSDI; and State or Territory opts to include
Nevada does not opt to include these case types
- 5 – Yes, a non-recipient parent due to other reasons
Nevada uses this indicator for fleeing felons and drug convicted household members

- 6 – No, a non-recipient, but not a parent
These are Nevada’s non-needy care taker cases or child only kinship cases
- 7 – No, an ineligible alien due to immigration status
These are Nevada’s child only cases with an ineligible alien adult(s)
- 8 – No, a non-recipient parent receiving SSI or Adult Program assistance (aid to the needy aged, blind and disabled) in the Territories
Nevada opts to include these adults and these cases are child only cases with the adult(s) receiving SSI)
- 9 – No, parent caring for a disabled family member in the home
Nevada is validating this family type and identifying them with a NEON code of ‘I’ in the NOMADS system.
- 10 – No, a parent receiving SSDI (and State or Territory opts to exclude)
Nevada is validating this family type and identifying them with a NEON code of ‘S’ in the NOMADS system.
- 11 – No, a non-recipient, non-custodial parent
Nevada does not opt to include these case types
- 12 – No, a deceased individual who died in a month preceding the report month and, due to State requirements to provide timely notification to the family before reducing the grant or other reasons (e.g., the family failed to report the death to the TANF agency), the family’s grant for the report month included the deceased individual’s needs
Nevada will validate these individuals through case audits.

Date of Birth (Child) – This date is validated by the case worker and is extracted from NOMADS when the universe pull is done.

The above data elements are validated by performing case file and system audits, and ensure work verification regulations are being met.

2. Procedures Employed To Eliminate Data Inconsistencies Between Two Or More Data Elements

When sample cases are imported into the Federal TANF Data Reporting and SSP-MOE Data Reporting databases, Structured Query Language (SQL) queries are executed to eliminate any data inconsistencies between two or more data elements. Nevada also validates, corrects and retransmits the corrected data inconsistencies that are reported on the inconsistency reports received from ACF on a quarterly basis.

Work Participation Status

- A. Nevada’s procedures to ensure that a family is not disregarded from the WPR for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age

The State’s eligibility computer system is programmed to capture and maintain the number of exemption months used by a single custodial parent with a child less than one year of age and alert the case manager when the lifetime limit has been reached.

The State also uses an employment and training computer system known as OASIS in capturing work participation information, including work activity records and supportive service payments. When a single adult parent with a child less than 12 months elects to use their exemption, these individuals sign a Single Adult Parent 12-Month NEON Exemption form and the forms are maintained in the case file and/or in PDF format in OASIS. These individuals are identified with an exemption code of 'E' in NOMADS and OASIS. The Federal Work Participation Status code 01 is programmed to populate based upon the above criteria. DWSS Information Service computer programmers and computer system testers validate this criterion.

B. Nevada's procedures to ensure that a family is not disregarded from the WPR for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work

Nevada's TANF program is structured to not provide assistance based upon a work eligible individual's refusal to participate in work activities. The TANF case is terminated for non-cooperation.

C. Nevada's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker with a child under age six

TANF Data Reporting computer system coding is in place to ensure that a single parent household deemed engaged in 20 hours of participation in countable work activities with a child under age six is captured and reported as a Work Participation Status code 17. DWSS Information System computer programmers and computer system testers validate the system code. SQL queries into the TANF Data Reporting and SSP-MOE Data Reporting databases are used in order to validate captured data.

This is to certify that Nevada's TANF Work Verification Plan dated October 2008 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Nevada will be operating effective October 1, 2008.

(signature)

~~Nancy K. Ford~~ Steven Fisher _____

Administrator _____
(title)

(date)